

**WEIL, GOTSHAL & MANGES LLP**

Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
New York, NY 10153-0119  
Tel: (212) 310-8000  
Fax: (212) 310-8007

**KELLER & BENVENUTTI LLP**

Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (415) 636-9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN THE  
DEBTORS AND THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
EXTENDING TIME TO RESPOND TO  
THE TORT CLAIMANTS  
COMMITTEE'S MOTION TO EXTEND  
THE BAR DATE**

Re: Dkt. No. 4292

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee  
4 of Tort Claimants (“**Tort Claimants Committee**”), on the other hand. The Debtors and the Tort  
5 Claimants Committee are referred to in this Stipulation and Agreement for Order collectively as  
6 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On October 18 2019, the Tort Claimants Committee filed the *Motion of the*  
9 *Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§ 105 and 501 and Fed. R. Bankr.*  
10 *P. 3003(c) for Entry of an Order Extending the Bar Date* [Dkt. No. 4292] (the “**TCC Bar Date**  
11 **Extension Motion**”), which is set for a hearing before the Court at 10:00 a.m. on November 13,  
12 2019. Any response or opposition to the TCC Bar Date Extension Motion is due by 4:00 p.m.  
13 (Pacific Time) on November 6, 2019.

14 B. Counsel for the Debtors has requested, and counsel for the Tort Claimants  
15 Committee has agreed, that the time for Debtors to respond to the TCC Bar Date Extension  
16 Motion be extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
21 **THAT:**

22 1. The time for the Debtors to file and serve any response or opposition to the TCC  
23 Bar Date Extension Motion is extended through 4:00 p.m. (Pacific Time) on November 8, 2019.

24 [Signatures on next page]  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: November 4, 2019  
  
WEIL, GOTSHAL & MANGES LLP  
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp  
Thomas B. Rupp  
  
*Attorneys for Debtors  
and Debtors in Possession*

Dated: November 4, 2019  
  
BAKER HOSTETLER LLP  
  
/s/ David J. Richardson  
David J. Richardson  
  
*Attorneys for Official Committee of Tort  
Claimants*